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**To:** [Mailroom Mailbox](#)  
**Cc:** [Katherine Forward](#); [Jessica Ottawa](#); [georgeco](#)  
**Subject:** Submission on Change 1 to RPS - Trices Road Rezoning Group  
**Date:** Monday, 15 February 2021 3:02:35 pm  
**Attachments:** [image001.png](#)  
[2090.C1\\_RPS\\_final\\_submission\\_Trices\\_Rd\\_Rezoning\\_Grp.pdf](#)

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Good afternoon!

Please find submission attached on Change 1 to the RPS lodged on behalf of the Trices Road Rezoning Group. Please acknowledge receipt by return. Thanks!

Kind regards

**Fiona Aston**

Principal

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# Submission on Proposed Change 1 to Canterbury Regional Policy Statement

15 February 2020

Environment Canterbury

## RESOURCE MANAGEMENT ACT 1991

### ENVIRONMENT CANTERBURY

#### SUBMISSION ON THE PROPOSED CHANGE 1 TO THE CANTERBURY REGIONAL POLICY STATEMENT

##### **Submitter Details**

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##### **Trade Competition:**

Ability to gain a trade competition advantage through this submission - No

##### **Provisions to Which this Submission Relates:**

Proposed Change 1 in its entirety.

##### **Position on these Provisions:**

We oppose Proposed Change 1 in its entirety.

##### **Reasons for opposing these Provisions** (see also reasons under specific relief sought)

###### **Background**

The Submitters are a landowner group who are working together on a rezoning proposal for their land ('the Site') at Trices Road, Prebbleton. The Site is 'sandwiched' between the current southern boundary of Prebbleton township, and the proposed Birchs Road District reserve adjoining to the south.

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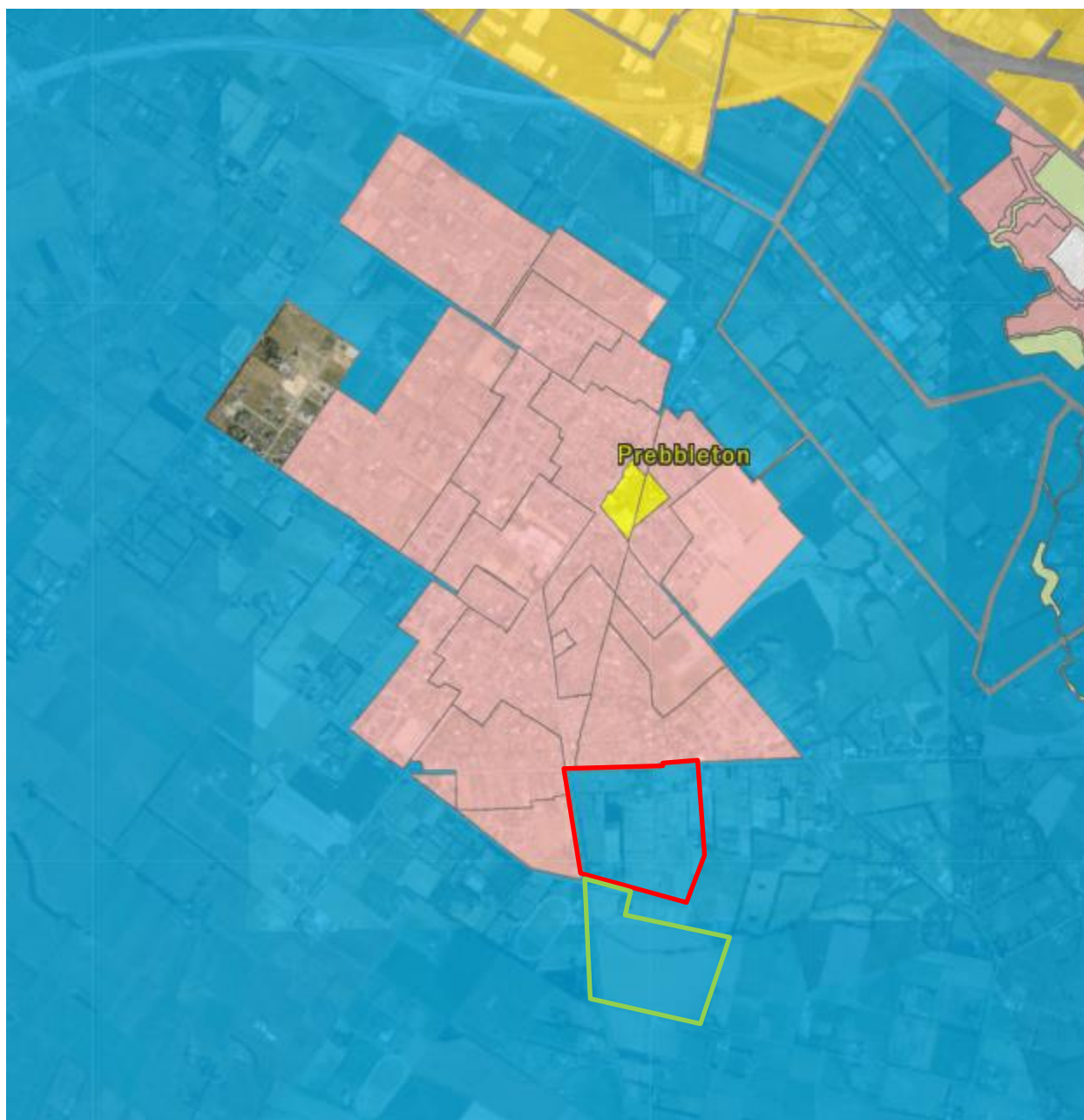


Figure 1: Site location – site outlined in red, Birchs Road Reserve outlined in green

The Submitters have lodged a private plan change request (see <https://www.selwyn.govt.nz/property-And-building/planning/strategies-and-plans/selwyn-district-plan/plan-changes/plan-change-72,-amend-the-selwyn-district-plan-to-enable-development-of-28.7-hectares-of-land-for-residential-purposes,-prebbleton>), and submission on the Selwyn Proposed District Plan Review seeking rezoning for residential purposes (28.7 ha). Key points to note are that:-

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- The Site is an ideal and logical location for further urban growth of Prebbleton and will achieve a compact, and efficient, urban form with excellent connectivity by multiple transport modes as well as bridging the existing urban area to the proposed Birchs Road reserve to the south. It is located on the Birchs Road bus route; the route of the cycle Rail Trail which connects the city, Prebbleton and Lincoln; and is within walking distance of Prebbleton town centre.
- The rezoning will accommodate a further 290+ households which represents the equivalent of 20% of the current housing stock (1497 households 2018 Census) at Prebbleton; it will supply significant additional capacity and contribute to a well-functioning urban environment, meeting the National Policy Statement on Urban Development 2020 (**NPS-UD**) Objective 6 c) and Policy 8 criteria for ‘unanticipated’ (in an RMA document) plan changes.
- A high amenity master planned development is proposed.
- There is no additional cost to the Council in re-zoning the Site as there is capacity in the public utilities and the existing road network, including planned upgrades.

The Submitters are concerned to ensure that Proposed Change 1 provides an appropriate planning framework for meritorious proposals such as theirs - which give effect to the NPS-UD and will assist in addressing the current housing crisis by releasing more appropriately located land for a variety of housing types in response to demand, adding greater competition and supply to the land and housing markets.

### Scope and timing

Proposed Change 1, is stated as a targeted change to provide a planning policy framework to enable District Plans to zone enough land to meet the minimum medium-term housing targets in the Canterbury Regional Policy Statement (**CRPS**). Wider and longer-term urban development issues will be considered as part of a scheduled full review of the CRPS in the next four years.

However, Proposed Change 1 does not give effect to the NPS-UD or its predecessor the National Policy Statement – Urban Development Capacity (NPS-UDC) in a number of fundamental ways, and in this respect, cannot be supported in its current form (for the reasons set out below).

The NPS-UD builds on the NPS-UDC with both NPSs requiring a responsive and timely approach to urban growth management, which ensures an ongoing ample release of land for housing, with sufficient development capacity to meet needs, and to facilitate competition in the market. A key

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objective is to address the current housing crisis, in particular by improving housing affordability. Councils are to set minimum housing and business land targets/bottomlines in order to ensure there is at least sufficient development capacity over the short, medium and long term. The NPS-UD refines the HCDA required methodology and adds a specific requirement for a responsive approach to 'unanticipated' rezoning proposals which add significant development capacity.

The Submitters acknowledge that Councils have until 2024 to prepare and publicly notify a Future Development Strategy, and until 31 July 2021 to provide a revised Housing Capacity Assessment. However, the Submitters do not consider the approach taken displays sound planning practice in the Greater Christchurch context.

There has been a 'flood' of private plan change applications lodged seeking urban rezoning since the NPS-UD was gazette in August 2020 - 13 to date in Selwyn District, in addition to a further 2 lodged prior to this; cumulatively capable of delivering 872 ha of further urban development (approximately 10 000 households). There is clearly strong 'pent up' demand for further housing and business land, unable to be progressed prior to this due to the very restrictive CRPS urban growth management 'regime'. The Selwyn and Waimakariri District Plans are also under review; with the Selwyn District Plan having been notified in October of 2020, and the Waimakariri District Plan due for notification around March 2021. Comprehensive change to the CRPS policy framework is required now to enable these private requests and reviews to respond to and implement the NPS-UD, particularly in relation to the Objective 6 directive – that local authority decisions must be strategic over the medium and long term and responsive, particularly to proposals that would supply significant development capacity. Policy 1 of the NPS-UD also requires that planning decisions have or enable (amongst other things) a variety of homes that meet the needs, in terms of type, price, and location.

#### National Policy Statement – Urban Development 2020

Proposed Change 1 does not give effect to the NPS-UD in a number of fundamental ways, and in this respect cannot be supported in its current form.

#### **(i) Sufficient development capacity/housing capacity assessment**

Proposed Change 1 only enables Councils to rezone enough land (and no more) to meet any shortfalls in land supply to meet the medium term (next 10 year) targets specified in Table 6.1. These targets are the 'minimums' necessary to meet anticipated demand, and are, in combination with the fixed urban/rural boundary, a very restrictive urban growth management approach. They are completely at odds with the intent of the NPS-UD to *"improve housing*

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*affordability by supportive competitive land and development markets”; provide “at least sufficient development capacity to meet demand”; and be “responsive, in particular to proposals that would supply significant development capacity”. The Submitters consider that competition is not achieved when there is very limited supply, and responsiveness is inhibited when restrictive targets and fixed boundaries are implemented.*

A minimum targets approach will fail to deliver if the targets underestimate demand. The targets were prepared for Our Space 2018-2048 and are already out of date. They are also very sensitive to assumptions made regarding what is feasible development and to the methodology employed, as recognized and acknowledged by the Our Space Commissioners.

The Council Housing Capacity Assessments (**HCA(s)**) also tend to overestimate the capacity for infill development. For example, in the Rolleston context, the Plan Change 64 HCA finds that the Selwyn District Council’s (**SDC**) existing (2018) capacity assessment over-estimates the capacity remaining in the existing Rolleston Outline Development Plans by 1710 households or over 50% i.e. 3082 households compared to the PC64 estimate of 1372 households – see [https://www.selwyn.govt.nz/\\_data/assets/pdf\\_file/0007/355867/Application-for-Notification-Appendix-F-Capacity-Assessments-20201008.pdf](https://www.selwyn.govt.nz/_data/assets/pdf_file/0007/355867/Application-for-Notification-Appendix-F-Capacity-Assessments-20201008.pdf). This overestimate is principally because the SDC assessment does not take account of existing development constraints, including the existing pattern of small holdings and dwelling and curtilage areas which limit the capacity for ‘infill’, the existing unusual shaped (and sized) lots, and the difficulties in achieving site amalgamation given the fragmented land ownership and access constraints, including existing rights of ways serving multiple small large holdings; or land designated or required for future infrastructure.

Given the high level of uncertainty with the accuracy, (including over time of the housing capacity minimum targets) some wriggle room should be applied i.e. more land released for development than is necessary to meet just, but not more than, the minimum targets set by Council derived HCAs. This approach would also be consistent with the NPS-UD intent of providing for at least sufficient capacity to meet targets (now ‘bottom lines’ in the NPS-UD). There should also be the opportunity for evidence-based assessment of those HCAs, with the ability for meritorious rezoning options to be considered which meet demand not adequately captured by the HCAs i.e. to implement Policy 8 of the NPS-UD.

## **(ii) Fixed non contestable rural/urban boundary**

This fixed Projected Infrastructure Boundary (**PIB**) has been retained through the Proposed Change 1, but the submitters consider that it is clearly contrary to the NPS-UD 'responsive planning approach' (including RPS Objective 6.2.1). The development sector is in a much better position to identify and respond quickly to changing market needs than local government bureaucracies. That is why a responsive planning approach is so important. Consequences of a fixed rural/urban boundary include: -

- Overly strict limitations on peripheral growth, which causes excessive land price inflation that in turn has a very negative effect on housing and business land affordability;
- A planning regulatory regime which provides for a contestable urban/rural boundary sends an important signal to the property market that it is best to get on with development rather than "land bank" (because there is excessive capital gain due to scarcity of land supply);
- A contestable urban/rural boundary is not 'laissez-faire' or ad hoc and will not result in uncontained urban sprawl. The relevant planning documents can, and should still require strategic planning, including with respect to infrastructure and an evidence base in support of any amendments to the boundary.

We understand that ECAN and the Greater Christchurch Partnership are concerned to ensure that the quantum of greenfield land released for development acts as a disincentive to urban intensification. However, the reality is:

- Containment and higher land values does not facilitate intensification;
- If the Central City and the Key Activity Centres are attractive, the market will locate there through people's choice and preference. Generally, carrots are better than sticks to achieve desired planning outcomes.

We understand that ECAN propose a second Change (Proposed Change 2) to be notified soon (March – June 2021) which will set criteria for determining what plan changes will be treated as adding significantly to development capacity (for the purposes of implementing Policy 8 of the NPS-UD). However, this is not workable if the fixed urban/rural boundary line remains. The Submitters consider that the piecemeal and incomplete approach to addressing the requirements of the NPS-UD does not result in sound planning practice, and is therefore opposed.

## **(iii) Well-functioning urban environments**

The NPS-UD seeks to achieve well-functioning urban environments, which includes the provision of growth in locations close to employment, that are well serviced with public transport (existing



or planned), and where there is high demand for housing and business land relative to other areas. The proposed Future Development Areas (**FDA(s)**) in comparison to alternative locations, have not been assessed against these criteria – the s32 assessment of Proposed Change 1 is silent on such assessment.

The Submitters Site has been assessed against these criteria (as well as all other objectives and policies of the NPS-UD) and easily meets them all. These assessments were undertaken and provided in conjunction with both the Private Plan Change Application, and the submission on the Proposed Selwyn District Plan (**Appendix A**). In summary:

- there will be a variety of homes enabled by three lot types ranging from medium density to larger lots. This will significantly add to the choice of housing types at Prebbleton (currently skewed to the upper larger house type), increasing affordability and encouraging a more age and socio-economically diverse community.
- the Site is well-positioned, building as it does on an existing township that is well-serviced by public transport and cycling options; to provide good accessibility to jobs, community services, and open spaces
- the Site location mitigates climate change impacts and future natural hazards as it is located away from the coast, well removed from major rivers, and easily accessible by public and active transport modes.
- Prebbleton is well positioned with respect to major employment areas. It neighbours the substantial and fast growing south west Christchurch industrial area and is far closer to that than much of Christchurch as a location for jobs. It is also close to, and readily accessible to major employers at Lincoln, including the university and research institutes.
- There is high demand for further housing at Prebbleton, set against only one year's worth of remaining supply.

#### **(iv) FDAs – different spatial scenarios**

The NPS-UD requires a consideration of the advantages and disadvantages of alternative spatial scenarios for achieving the NPS-UD (see clause 3.14 (b)). Proposed Change 1 has not undertaken any such work, simply relying on the planning and infrastructure work undertaken when the PIB was first introduced 13 years ago.

There is no consideration of the option of providing for FDA land at Prebbleton, even though there was strong evidence presented at the Our Space hearing of the need for more housing land here to meet demand<sup>1</sup>, and the suitability of Prebbleton as a location for further growth. There are private plan changes requests for further urban growth at Prebbleton, including the Submitter's land (PC72) and land at west Prebbleton (PC68), in combination totalling 96 ha/appx. 1150 additional households.

The s32 assessment considers Option 6 'Advance greenfield areas in other locations' but does not define any such other locations. This option is dismissed without further consideration as 'not preferable to the PIB areas, not necessary to meet feasible development capacity, and because the scope of Proposed Change 1 is too narrow. Proposed Change 1 seeks to implement the Our Space document in a vacuum without addressing the revised focus and directives of the NPS-UD. Proposed Change 1 cannot be progressed as it fails to give effect to the NPS-UD as required by s62(3) of the RMA.

#### **(v) Our Space**

Proposed Change 1 implements an action in Our Space (2019) i.e. Action 9. Our Space identifies Future Development Areas on Map A of the RPS (Figure 16 of Our Space) but importantly notes:



These FDAs are now shown on Map A of Proposed Change 1 to the RPS, but urban development is entirely restricted to these FDAs only; even though they are intended to be indicative only. The flexibility in providing for future development areas that Our Space recommended is simply not recognised or provided for in Proposed Change 1. There is no ability for land outside the FDAs to be considered, even though the NPS-UD is very clear that a fixed 'immoveable' urban/rural boundary is contrary to the NPS-UD (see MfE Guidance note on Responsive Planning).

#### **(vi) Future Development Areas**

Proposed Change 1 proposes to limit FDAs to south Rolleston, west and east Rangiora, and north east Kaiapoi. These FDAs follow the Map A Projected Infrastructure Boundary for future residential areas only. The PIB was identified at the time Chapter 6 of the CRPS was first prepared

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See – evidence for Submitter 60 GFR Estates & Larsen Group  
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(it was first known as Change 1 to the RPS; notified in 2007 with decisions issued in 2009). It has been in place for 13 years, and predates the Canterbury 2010/11 earthquakes and the significant shift of the Greater Christchurch area westwards onto land less at risk of natural hazards (including earthquake events and sea level rise). It has not been subject to rigorous testing as the LURP (Land Use Recovery Plan) processes 'replaced' the normal RMA processes post the Canterbury earthquakes, with no appeal rights other than on points of law.

Prebbleton has continued to grow at pace in recent years, and now there is only one year in the supply of housing land remaining. The accessibility to the City and other fast growth areas such as Rolleston has also been greatly enhanced by the Southern Motorway and its recent extension. Notwithstanding, Proposed Change 1 does not propose any FDAs at Prebbleton. This is contrary to the NPS-UD which requires as a minimum, provision of a variety of homes to meet the needs, in terms of type, price, and location, of different households.

### Section 32 Assessment

The s32 assessment for Proposed Change 1, does not assess the identified options against the NPS-UD objectives and policies, even though its purpose is to give effect to NPS-UD directions. It is inadequate and incomplete.

### RMA

For all of the above reasons, Proposed Change 1 is contrary to the RMA (including both Part 2 and s32) and does not constitute sound resource management practice.

### **Decision/Relief Sought**

The Submitters seek the following relief:

1. Amendments to Proposed Change 1 to provide a more flexible and responsive urban growth management approach. This could include (but not be limited to)
  - enabling consideration of development proposals, private plan change requests and submissions on Plan Reviews which are outside the Proposed Change 1 Map A FDAs, priority greenfield, and existing urban areas; and/or
  - which exceed the minimum targets in Table 6.1; and
  - are consistent with and give effect to the NPS-UD; and
  - amendments to Policy 6.3.11 Monitoring and Review, Policy 6.3.12 Future Development Areas; and

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- change the status of FDAs to Greenfield Areas, with no restrictions on the quantum or timing of development; and
  - the changes outlined below; and
  - and/or in the case of resource consents, are of a minor nature (including zoning anomalies) and do not offend the overall strategic planning intent of the Chapter 6
2. If Map A is retained in its current form, amend by showing the Site outlined below (Figure 1) in orange as a Future Development Area - Residential.

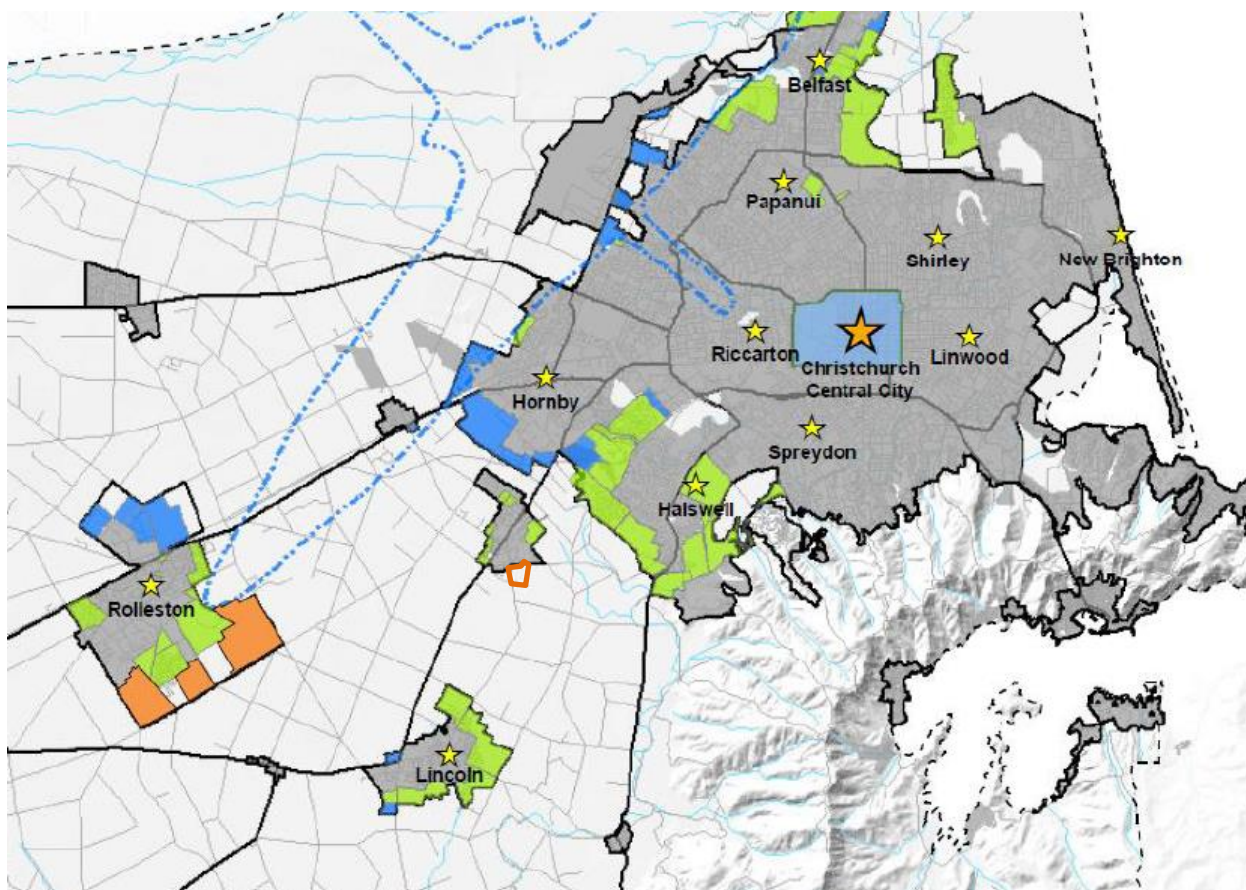


Figure 1: proposed Prebbleton Future Development Area – Residential (outlined in orange)

3. Amend Proposed Change 1 as below (additions in bold and underlined. Deletions in strike out).

#### 6.2.1 Recovery Framework

*Recovery, rebuilding and development are enabled within Greater Christchurch through a land use and infrastructure framework that:*

- ~~3. avoids urban development outside of existing urban areas or greenfield priority areas unless expressly provided for in the CRPS;~~

Reason:

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A fixed uncontestable urban/rural boundary as shown on Map A and associated CRPS objective and policies, does not give effect to the NPS-UD which requires a responsive planning approach (Objective 6c) and Policy 8). The Ministry for Environment Responsive Planning Guidance specifically states:

*a hard rural urban boundary without the ability to consider change or movement of that boundary would not meet the requirements of the responsive planning policy.<sup>2</sup>;*

If FDAs are retained,

#### 6.3.1 Development within the Greater Christchurch area

*In relation to recovery and rebuilding for Greater Christchurch:...*

4. *Enable development of existing urban areas and greenfield priority areas and **Future Development Areas**, including intensification in appropriate locations., ~~where is supports the recovery of Greater Christchurch.~~*
5. *Ensure new urban activities only occur within existing urban areas, ~~or~~ identified greenfield priority areas **and/** or **Future Development Areas** as shown on Map A....*

4. Any consequential amendments and such other additional or alternative relief as gives effect to the intent of this submission and is consistent with the interests of the Submitter.



.....  
(Signature of applicant or person authorized to sign on behalf of the applicant)

Date: February 15, 2021

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<sup>2</sup> NPS-UD 2020 MfE Responsive Planning Fact Sheet  
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## Appendix A: Assessment of National Policy Statement for Urban Development 2020 Objectives and Policies

### Acronyms

CIAL: Christchurch International Airport Limited

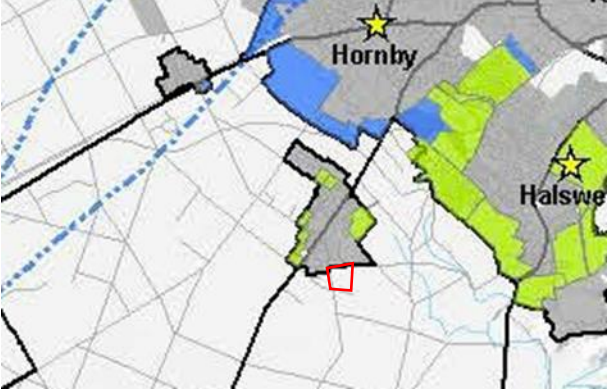
FDS: Future development Strategy

NPS-UD: National Policy Statement-Urban Development 2020

PSDP: Proposed Selwyn District Plan

RPS: Canterbury Regional Policy Statement

NPS-UD 2020 Objectives	Assessment
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposed development will further enable Prebbleton to sustain itself as a well-functioning urban environment by consolidating the residential area close to the town centre, and providing residential development close to public transport links and the proposed major Birchs Road Council reserve. There is a bus stop immediately to the north of the Birchs/Trices Rd intersection (adjoining the Site), with regular bus services to Christchurch City and Lincoln). The Urban Design Statement, at <b>Appendix 2</b> also addresses these aspects.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal provides for choice within the Prebbleton housing market, and in doing so, supports housing affordability. Currently, the housing market at Prebbleton is 'skewed' towards larger higher priced properties, with very limited smaller medium housing development. The proposal is for a minimum housing density of 12 households per ha, and will include more affordable, medium density housing options. This is a significantly higher density than the existing development density (which is 10 households per ha or less). The landowners have no other proposals in and around Prebbleton. Currently, the land and development market in Prebbleton is dominated by one major developer. This Site is multiple ownership and will provide the opportunity for other developers to enter the local market (some of the landowners intend to develop themselves and some will sell once the land is rezoned). This has also been addressed in the Economic Assessment at <b>Appendix 8</b> .

<p>Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: the area is in or near a centre zone or other area with many employment opportunities the area is well-serviced by existing or planned public transport there is high demand for housing or for business land in the area, relative to other areas within the urban environment.</p>	<p>The RPS is due for review in 2023, and a more immediate change is required to achieve consistency with the NPS-UD 2020.</p> <p>The west Prebbleton priority greenfield areas shown on Map A(green) are now fully developed (Site outline in red).</p>  <p>The remainder are the two PSDP Prebbleton development areas, both at Tosswill Road. This proposal has not been identified, but it occupies a block of rural land that will square up the town in its urban form, and will connect the existing built up area of Prebbleton with the proposed Birchs Road reserve to the south of the development area.</p> <p>The proposed LZ zoned land can be developed into approximately 290+ lots to assist in meeting the high demand for housing in Prebbleton. As recorded in the Urban Design Statement (<b>Appendix 2</b>), the Site meets all of the Objective 3 location criteria:</p> <ul style="list-style-type: none"> <li>- It is near and readily accessible to major employment areas at Lincoln, Rolleston and the south west Christchurch business and industrial hub;</li> <li>- It is well serviced by existing public transport; and</li> <li>- there is a very high demand for housing at Prebbleton.</li> </ul>
<p>Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</p>	<p>The proposal provides for LZ (26 ha) and a small area of L3 zoning (2.8 ha), within which provision is made for medium density housing with local amenity reserves to cater for the diverse and changing needs of people and the Prebbleton community. The Site has the Birchs Road Reserve on its southern boundary, providing important potential amenity and quality of environment benefits.</p>
<p>Objective 5: Planning decisions relating to urban environments, and FDSs, take into</p>	<p>Matter for statutory decision-makers.</p>



account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	
Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.	<p>The proponents have met with Council asset staff who have confirmed that the proposal can be properly serviced and is within the capacity of existing and planned public infrastructure.</p> <p>The land comprises Preferred Rural Residential Area 8 in the Selwyn Rural Residential Strategy (adopted in 2014). However, given the high demand for further urban housing at Prebbleton and the more recent Council acquisition and proposal for the Birchs Rd reserve adjoining to the Site, a more efficient use of the land is for urban residential purposes (apart from the township entry component, fronting Birchs Road, proposed to be rezoned Large Lot Residential). This has been further addressed in the Urban Design Statement at <b>Appendix 2</b>.</p> <p>See Policy 8 below for commentary on proposals which supply significant development capacity</p>
Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.	Matter for statutory decision-makers.
Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.	<p>The proposal adjoins the existing built up Prebbleton township, is close to public transport links, and adjoins the proposed Birchs Road Reserve.</p> <p>Its excellent accessibility to both Rolleston and Christchurch City, has been substantially enhanced with the new Southern Motorway extensions, and means it is now highly accessible to these nearby major employment areas, and also Lincoln. Travel distances are short, minimising vehicle miles and the potential for greenhouse gas emissions. There is a cycleway link from Prebbleton into Christchurch City, and regular bus services, including an express route.</p> <p>The Site is inland and not subject to natural hazard risks associated with sea level rise arising from climate change.</p>
<b>NPS-UD 2020 Policies</b>	<b>Assessment</b>
<p>Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</p> <p>(a) have or enable a variety of homes that:</p> <p>(i) meet the needs, in terms of type, price, and location, of different households; and</p>	<p>The proposal is for Living Z zoning with a small area of Living 3 (2.8ha). The Site has previously been identified as suitable for rural residential (in the Selwyn Rural Residential Strategy 2014). Both options will enable a variety of homes (from a density, price bracket, and size perspective) that will help meet the needs of different households. The location of the Site, also boasts good</p>



<p>(ii) enable Māori to express their cultural traditions and norms; and</p> <p>(b) N/A business sectors; and</p> <p>(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</p> <p>(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</p> <p>(e) support reductions in greenhouse gas emissions; and</p> <p>(f) are resilient to the likely current and future effects of climate change.</p>	<p>accessibility for people to their workplaces, community facilities, and open spaces (being the in-development reserve, the utility reserves (when dry), and the adjoining Birchs Road Reserve. The proponents are the collective landowners at the Site. They are not land developers, and therefore, have no other projects in the locality: this will provide choice and competition to the local housing market.</p> <p>Specific attention has been paid to stormwater management proposals to address the specific ground conditions, changes to flood events and rainfall intensities (<b>Appendix 4</b>)</p>
<p>Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</p>	<p>The PSDP only provides two development areas for Prebbleton, one of which is well advanced in development.</p> <p>The Trices Road proposal provides additional capacity to ensure that there is, actually, sufficient development capacity for a town that is growing apace and will continue to do so for the 10 year planning life of the District Plan. The housing stock demands for Prebbleton have been assessed in the Economic Assessment at <b>Appendix 8</b>.</p>
<p>Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable:</p> <p>(a) N/A in city centre zones;; and</p> <p>(b) N/A in metropolitan centre zones, and</p> <p>(c) N/A building heights of least 6 storeys within at least a walkable catchment...</p> <p>(d) in all other locations in the tier 1 urban environment, building heights and density of urban form commensurate with the greater of:</p> <p>(i) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or</p> <p>(ii) relative demand for housing and business use in that location.</p>	<p>The proposal adopts Zones and zone development and activity standards set in the PSDP. Prebbleton currently provides for suburban-type housing typologies with limited medium density housing options.</p> <p>The need for specific stormwater management areas within the Site to control run-off in to off-site drainage systems ensures that overall, the Site will provide housing of a lower density, but not nearly as low as is required under Large Lot Residential. With a minimum density standard of 12 households per ha (excluding stormwater management areas), the development will include more medium density housing than has been provided for in Prebbleton to date.</p> <p>The effective control on a standard 650m<sup>2</sup> lot (8m height limit) constrains heights to two storeys.</p>
<p>Policy 4: Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.</p>	<p>The proposal adopts Zones and zone development and activity standards set in the PSDP.</p>

Policy 5: N/A Regional policy statements and district plans applying to tier 2 and 3 urban environments	N/A Prebbleton is within Greater Christchurch and is defined as part of a Tier 1 urban area.
<p>Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <ul style="list-style-type: none"> <li>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</li> <li>(ii) are not, of themselves, an adverse effect</li> </ul> <p>(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)</p> <p>(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity</p> <p>(e) the likely current and future effects of climate change.</p>	<p>In preparing the Prebbleton Structure Plan (2010) The Selwyn District Council engaged with the Prebbleton community over possible urban futures for the town. Whilst the Structure Plan claims to provide a guiding framework for development over the next 30 years i.e. to 2040, the areas it identifies for future urban growth are all now essentially fully urbanised. It is clearly out of date and in need of review. The Site was identified as a preferred rural residential area in the Selwyn Rural Residential Strategy 2014. This is now also overdue for review and out of date. Given the continued high demand for housing at Prebbleton and the subsequent Council acquisition and planned development of a substantial reserve on land adjoining to the south of the Site, the more efficient use of the Site is for urban residential purposes (apart from the small Birchs Road frontage area, proposed to be zoned Living 3).</p> <p>The ODP/Development Plan (DEV-PR3) for the Site provides control over the key structural elements of the development. This ensures there is good integration to adjoining residential land, and appropriate access points are locked in to provide for ease of movement, and not just by car.</p> <p>The amenity values are set by the PSDP subdivision, development, and activity standards therefore, the Site will comfortably relate to, and form part of, the rest of Prebbleton as it develops. The Site values assessment also benefit for its co-location, adjoining Birchs Road Reserve.</p> <p>The servicing proposals factor in effects of climate change in its designs for stormwater management.</p>
Policy 7: Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and the long term in their regional policy statements and district plans.	This requires a change to the RPS. The RPS contains housing targets (Table 6.1) which were inserted to meet the requirements of the NPS-UDC. They are now out of date as the NPS-UD 2020 has replaced the NPS-UDC. It is understood that revised housing capacity assessments and bottom lines must be completed by July 2021. The Economic Assessment ( <b>Appendix 8</b> ) is that there is only 1 year housing supply left at Prebbleton. This proposal will increase capacity to 3.9 years, enabling the short term capacity requirements to

	be met, but not the medium or long term requirements.
<p>Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well functioning urban environments, even if the development capacity is:</p> <ul style="list-style-type: none"> <li>(a) unanticipated by RMA planning documents; or</li> <li>(b) out-of-sequence with planned land release.</li> </ul>	<p>This Policy can be read to apply to submissions to the PSDP and plan changes to the Operative District Plan.</p> <p>This proposal will add 297+ lots to the housing supply for Prebbleton and its location in the “gap” between the existing urban area and the proposed Birchs Road Reserve to the south will assist in delivering a compact, linked up well-functioning urban environment. It will contribute approximately 20% more lots than the existing supply at Prebbleton (1497 hhs 2018 Census), which is a significant addition.</p>
<p>Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:</p> <ul style="list-style-type: none"> <li>(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and</li> <li>(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and</li> <li>(c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and</li> <li>(d) operate in a way that is consistent with iwi participation legislation.</li> </ul>	Matter for statutory decision-makers.
<p>Policy 10: Tier 1, 2, and 3 local authorities:</p> <ul style="list-style-type: none"> <li>(a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and</li> <li>(b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and</li> <li>(c) engage with the development sector to identify significant opportunities for urban development.</li> </ul>	<p>There is a present planning hiatus in greater Christchurch awaiting engagement on the foreshadowed change to the RPS (date unknown) followed by a full review in 2023.</p> <p>This submission enables the Greater Christchurch Councils to engage in the proposal ahead of the change to the RPS.</p>

<p>Policy 11: In relation to car parking:</p> <p>(a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and</p> <p>(b) tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.</p>	<p>The proposal adopts Zones and zone development and activity standards set in the Operative District Plan.</p>
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